

Craig K. Perry (Bar No. 3786)
cperry@craigperry.com
CRAIG K. PERRY & ASSOCIATES
2300 W. Sahara Avenue, Suite 800
Las Vegas, Nevada 89102
(702) 228-4777 / Fax (702) 943-7520
Counsel for Plaintiff Vatche Sarkoyan

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Vatche Sarkoyan,)
v.)
Experian Information Solutions, Inc.,)
Plaintiff,)
Defendant.)
CASE NO.: 2:24-cv-02321-JCM-DJA

**Amended Proposed Discovery Plan and
Scheduling Order**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

As amended on pages 1 and 2

Plaintiff Vatche Sarkoyan and Defendant Experian Information Solutions, Inc., by and through their counsel, submit this Amended Proposed Discovery Plan and Scheduling Order.

PROPOSED DISCOVERY PLAN

1. **Discovery Cut-Off Date**. The parties request one hundred eighty (180) days for discovery calendared from the time Defendant Experian Information Solutions, Inc. answered the complaint on 3/14/2025. Accordingly, the proposed cut-off date for discovery shall be 9/10/2025.

2. **Amending the Pleadings and Adding Parties.** All motions to amend the pleadings or to add parties shall be filed no later than 6/12/2025, 90 days before close of discovery.

3. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts)**. Disclosures and reports concerning experts shall be made by ~~7/12/2025~~7/14/2025, 60 days before the discovery cutoff date. Rebuttal disclosures and reports concerning experts shall be made by 8/11/2025, 30 days after the initial disclosure of experts.

1 4. **Dispositive Motions:** The date for filing dispositive motions shall not be later than
2 10/10/2025, 30 days after the discovery cut-off date. In the event that the discovery period is
3 extended from the discovery cut-off date set forth in this proposed Discovery Plan and
4 Scheduling Order, the date for filing dispositive motions shall be extended not later than 30 days
5 from the subsequent discovery cut-off date.

6 5. **Pretrial Order.** The date for filing the joint pretrial order shall not be later than
7 ~~11/10/2025~~
8 ~~11/9/2025~~, 30 days after the dispositive motion deadline. In the event that dispositive motions are
9 filed, the date for filing the joint pretrial order shall be suspended until 30 days after the decision
10 on the dispositive motions or until further order of the court. In the further event that the
11 discovery period is extended from the discovery cut-off date set forth in this Discovery Plan and
12 Scheduling Order, the date for filing the joint pretrial order shall be extended in accordance with
13 the time periods set forth in this paragraph.

14 6. **Pretrial Disclosures.** The disclosures required by Fed.R.Civ.P. 26(a)(3) and any
15 objections hereto, shall be included in the joint pretrial order.

16 7. **Extensions or Modifications of the Discovery Plan and Scheduling Order.**
17 Applications to extend any date set by the discovery plan, scheduling order, or other order must
18 comply with the Local Rules.

19 8. **Initial Disclosures.** The Parties shall make their Initial Disclosures on or before
20 4/28/2025.

21 9. **Protective Order.** The Parties may seek to enter a stipulated protective order pursuant to
22 Rule 27(c) prior to producing any confidential documents. The Parties will meet and confer
23 regarding a stipulated protective order governing confidential information and will aim to file the
24 same by 4/28/2025, so as not to delay production of discovery.

25 10. **Electronic Service.** The Parties agree to the electronic service of discovery documents.
26 Pursuant to Rule 5(b)(2)(E) and 6(d) of the Federal Rules of Civil Procedure, any pleadings or
27 other papers may be served by sending such documents by email to the primary and secondary
28 email addresses of all counsel of record (or any updated email addresses provided to all counsel
of record).

1 Upon request, the Parties must promptly provide the sending party with confirmation of receipt of
2 the service by email.

3 **12. Evidence in Electronic Format.** Pursuant to Local Rule 26-1(b)(9), the parties certify
4 that they have discussed and have agreed to present evidence in electronic format to jurors for the
5 purposes of jury deliberation, and stipulate to provide discovery in an electronic format
6 compatible with the court's electronic jury evidence display system. The parties further agree to
7 consult the court's website or contact the assigned judge's courtroom administrator for
8 instructions on how to prepare evidence in an electronic format and other requirements for the
9 court's electronic jury evidence display system

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1 **13. Alternative Dispute Resolution ("ADR") Certification.** The Parties will further discuss
2 the possibility of using ADR processes including mediation, arbitration, and early neutral
3 evaluation. The Parties are engaged in settlement negotiations and will attempt to reach an early
4 case resolution.

5 **14. Alternative Forms of Case Disposition Certification.** The Parties conferred regarding
6 consent to trial by a magistrate judge under 28 U.S.C Section 636(c) and Fed. R. Civ. P. 73 and
7 the use of the Short Trial Program (General Order 2013-01). The Parties have not reached any
8 stipulations at this stage.

9 Dated: 5/5/2025

10 By: /s/ Craig K. Perry

11 Craig K. Perry, Esq.
12 2300 W. Sahara Ave., Suite 800
13 Las Vegas, NV 89102
14 (702) 228-4777 / Fax: (702) 943-7520
15 cperry@craigperry.com
16 Counsel for Plaintiff Vatche Sarkyan

17 NAYLOR & BRASTER

18 /s/ Jennifer L. Braster

19 Jennifer L. Braster, Esq.
20 10100 W. Charleston Blvd., Suite 120
21 Las Vegas, Nevada 89135
22 (702) 420-7000 /
23 jbraster@nblawnv.com
24 Counsel for Defendant Experian Information Solutions, Inc.

25 **IT IS SO ORDERED.**



26 DANIEL J. ALBREGTS
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: May 6, 2025

CERTIFICATE OF SERVICE

I hereby certify that on 5/5/2025, I filed the Amended Proposed Discovery Plan and Scheduling Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jennifer L. Braster, Esq.
NAYLOR & BRASTER
10100 W. Charleston Blvd., Suite 120
Las Vegas, Nevada 89135

Attorney for Defendants
Experian Information Solutions, Inc.

/s/ Tyrin Kanemeier
Tyrin Kanemeier

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10100 W. Charleston Blvd., Suite 120
Las Vegas, Nevada 89135

Attorney for Defendants
Experian Information Solutions, Inc.

/s/ Tyrin Kanemeier
Tyrin Kanemeier

tyrin@craigperry.com

From: Jennifer Braster <jbraster@nblawnv.com>
Sent: Monday, May 5, 2025 1:29 PM
To: Craig Perry
Cc: Green, Hillary; Tyrin Kanemeier
Subject: RE: Sarkoyan v. Experian

Thank you. You may submit with my e-signature. Are you sending over the wife's plan today as well?

Jennifer L. Braster
(702) 420-7997
jbraster@nblawnv.com

From: Craig Perry <cperry@craigperry.com>
Sent: Monday, May 5, 2025 1:06 PM
To: Jennifer Braster <jbraster@nblawnv.com>
Cc: Green, Hillary <Hillary.Green@experian.com>; Tyrin Kanemeier <tyrin@craigperry.com>
Subject: Re: Sarkoyan v. Experian

Please review the attached (added paragraph is now paragraph 12), and let me know if I can file with your e-signature affixed.

Craig K. Perry
Attorney at Law
6210 N. Jones Boulevard, #753907
Las Vegas, Nevada 89136
(702) 893-4780 (direct)
(702) 893-4777 (office manager)
cperry@craigperry.com

On Mon, May 5, 2025 at 12:39 PM Jennifer Braster <jbraster@nblawnv.com> wrote:

Perfect. Thanks.

Jennifer L. Braster
(702) 420-7997
jbraster@nblawnv.com

From: Craig Perry <cperry@craigperry.com>
Sent: Monday, May 5, 2025 12:05 PM
To: Jennifer Braster <jbraster@nblawnv.com>